

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

Plaintiff,

v.

STATE OF RHODE ISLAND

Defendant.

Case Nos. CA 14-175; 13-442

JOINT FILING IN ADVANCE OF APRIL 10, 2018 STATUS CONFERENCE

In advance of the status conference on Interim Settlement Agreement and Consent Decree compliance scheduled for April 10, 2018, the parties jointly submit the following summary of topics for discussion. The parties anticipate discussion of the Interim Settlement Agreement, followed by the Consent Decree.

For the Interim Settlement Agreement topics, the parties anticipate that the Court Monitor, counsel for the State of Rhode Island, counsel for Providence Public School District, and counsel for the United States (in that order) will discuss the following topics. The parties anticipate taking turns to address each topic before turning to the next topic.

- 1) **Employment Placements** - the status of supported employment placements, as required by Section IV of the Interim Settlement Agreement;
- 2) **Day Services** - the status of Integrated Day Services, as required by Section VI of the Interim Settlement Agreement;
- 3) **Career Development Plans and Person-Centered Planning** – the status of the number and quality of career development and benefits plans, as required by Sections IV and VII of the Interim Settlement Agreement; and

- 4) **Any other compliance related issues** that the Court or the parties deem relevant.

For the Consent Decree topics, the parties anticipate that the Court Monitor, counsel for the State of Rhode Island, and counsel for the United States (in that order) will discuss the following topics. The parties anticipate taking turns to address each topic before turning to the next topic.

- 1) **Funding** – the status of funding, as required by Section XIV of the Consent Decree;
- 2) **Quality Improvement** – the status of Quality Improvement, as required by Section IV of the Consent Decree;
- 3) **Employment Placements** - the status of supported employment placements including the State's compliance with its plan for achieving Consent Decree placement outcomes for the Youth Exit Target Population, as required by Section IV of the Consent Decree;
- 4) **Day Services** - the status of Integrated Day Services as required by Section VI of the Consent Decree;
- 5) **Career Development Plans and Person-Centered Planning** - the status of the number and quality of career development and benefits plans, and the State's actions to ensure that career development and benefits plans are provided to all individuals who need them, as required by Sections IV, VII, and VIII(4)(e) of the Consent Decree; and
- 6) **Any other compliance related issues** that the Court or the parties deem relevant.

At the conclusion of the April 10, 2018 status conference, the parties will request that the Court schedule the next status conference on Consent Decree and Interim Settlement Agreement compliance for September 2018.

Dated: April 5, 2018

Respectfully submitted,

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